

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

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IN RE: ZIMMER NEXGEN KNEE IMPLANT PRODUCTS LIABILITY LITIGATION	MDL No. 2272
This Document Relates To: All Cases	Master Docket Case No. 1:11-cv-05468
	Hon. Judge Rebecca R. Pallmeyer
	<b>STIPULATED MOTION TO EXTEND TIME TO EXCHANGE INITIAL TRIAL SELECTIONS AS CONTEMPLATED IN JOINT TRIAL PLAN</b>

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1. The Plaintiffs and the Zimmer Entities<sup>1</sup> (together, the “Parties”) jointly stipulate and agree to a brief extension of time for the Parties to file their respective selection of cases from the MDL to fill slots in the Case Pool.

2. The Parties originally contemplated and agreed to file their respective selections of cases from this MDL to fill slots in the Case Pool by November 21, 2012 at Noon Central Time.

3. On November 20, 2012, after a meet and confer, the Parties agreed to the entry of an order extending the time to file their respective selections to November 28, 2012 at Five o’clock pm Eastern Standard Time (5:00 pm EST).

4. This extension of time further extends the time for Case-Specific Discovery to commence. It is agreed that Case-specific discovery shall commence on November 28, 2012.

5. This extension of time does not alter any other agreed to deadlines in the Trial Plan Order filed on October 19, 2012 (Docket 653).

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<sup>1</sup> For purposes of this stipulation, “Zimmer Entities” includes the following defendants in this action: Zimmer, Inc., Zimmer Holdings, Inc., and Zimmer Surgical, Inc., f/k/a Zimmer Orthopaedic Surgical Products, Inc.

/s/ James R. Ronca  
Lead Counsel

Date: November 21, 2012

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For the Defendants:

/s/ Joseph H. Yeager, Jr.  
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Date: November 21, 2012

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**CERTIFICATE OF SERVICE**

I certify that on this 21<sup>st</sup> day of November, 2012, a true and correct copy of the  
STIPULATED MOTION TO EXTEND TIME TO EXCHANGE INITIAL TRIAL  
SELECTIONS AS CONTEMPLATED IN JOINT TRIAL PLAN was electronically filed with  
the Clerk of the Court using CM/ECF. Notice of this filing will be served on all parties of record  
by operation of the ECF system.

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